

EXHIBIT H

STUART PATTERSON Vol.1
STYLLER V. HEWLETT-PACKARDNovember 12, 2020
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<p style="text-align: right;">Page 29</p> <p>1 There is an executive floor. Who is on that floor 2 is the top of the company, so it is informal, but 3 sure sign of power. 4 Let's move on, Mr. Slattery -- 5 Mr. Patterson. I apologize. 6 Have you spoken with Mr. JT Silvestri, Tom 7 Harris, Jim O'Grady, or Kevan Bartley after their 8 depositions? 9 MR. BUNIS: Objection. Compound. 10 You can answer. 11 A. No. 12 BY MR. JOFFE: 13 Q. Have you read the transcripts of their 14 depositions? 15 A. No. 16 Q. Have you watched videos of their 17 depositions? 18 A. No. 19 Q. Have your lawyers -- without getting into 20 the substance, Mr. Patterson -- I don't want to get 21 into the substance of your conversations with your 22 attorneys, but I want to ask you about the fact of 23 those conversations. Okay? There is a difference. 24 So did you have conversations with your 25 attorneys about the testimony given by Mr. Gill,</p>	<p style="text-align: right;">Page 31</p> <p>1 MR. BUNIS: And I am going to instruct 2 the witness not to answer the question. And, 3 Dimitry, again, I think you are confusing whether 4 something needs to be listed on a privilege log and 5 what the obligations are with respect to that, and 6 whether this witness can answer questions you are 7 asking him about the substance of conversations 8 between him and his lawyers. So I am going to 9 instruct the witness not to answer. 10 MR. JOFFE: Counsel, I think that you 11 are confusing -- you are confusing privilege logs 12 and you are confusing the basic principle of 13 claiming privilege in the first place, whether it's 14 in the privilege log, an oral conversation, in 15 testimony, or in court. 16 In order to claim privilege, the 17 claimant must state the subjects of that 18 communication, the parties to that communication, 19 the time and date of that communication, the subject 20 matter of that communication, and give general 21 descriptions of what was discussed. If you do that, 22 then your conversation would be claimed privilege. 23 If you don't, there is no claim of privilege. You 24 know it perfectly well. 25 BY MR. JOFFE:</p>
<p style="text-align: right;">Page 30</p> <p>1 Mr. Pat- -- Mr. Bartley, Harris, and Silvestri? 2 MR. BUNIS: Instruction not to answer. 3 Calls for attorney-client communication. 4 Don't answer. 5 BY MR. JOFFE: 6 Q. I am asking you about -- if there were 7 communication on the subject, Mr. Patterson, you are 8 to tell me whom the communication was with at the 9 time, the subject matter of that communication, and 10 the general description in order to claim privilege. 11 So if you want to say that you had 12 conversations on such and such a date -- if you can 13 tell me that on November 9 I had a conversation with 14 Mr. Bunis on the subject of X, then you can claim 15 privilege on that communication, but if you don't, 16 there is no basis for claiming privilege so -- 17 MR. BUNIS: Dimitry -- 18 BY MR. JOFFE: 19 Q. That is what I want to ask you. I will 20 repeat my question. And this is just the fact of 21 communication, not what was said, not what was 22 advice, not what you asked about it. Just merely 23 the fact whether your attorneys discussed testimony 24 given by your colleagues or former colleagues in 25 this case.</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Mr. Patterson, if your counsel instructs 2 you not to answer, you should not answer. I will 3 not probe further. But I will go to court, and I 4 will upend those instructions, and I will call you 5 back for another day of testimony. Okay? I just 6 want to give you a fair warning. In our view, those 7 instructions are wholly improper. 8 MR. BUNIS: So I'm just -- 9 MR. JOFFE: So we'll move on. 10 Michael, I -- you said your piece. I said mine. 11 We're moving on. Moving on. 12 MR. BUNIS: Okay. 13 MR. JOFFE: But that is just a fair 14 warning. 15 MR. BUNIS: Dimitry -- Dimitry, I am 16 just going to tell you now -- 17 MR. JOFFE: We are moving on. 18 MR. BUNIS: Well, please don't 19 interrupt me. Please don't interrupt me. 20 MR. JOFFE: You are interrupting me 21 all of the time. Michael, your proper role is to 22 state objection or instruction to the witness. 23 Everything else is interrupting me. I don't 24 interrupt you. You interrupt me. I'm here to ask 25 my witness questions.</p>

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<p style="text-align: right;">Page 33</p> <p>1 MR. BUNIS: Counsel --</p> <p>2 MR. JOFFE: You are here to sit</p> <p>3 silent. Make an objection -- not speaking</p> <p>4 objection. Object. That is it. Or instruct the</p> <p>5 witness not to answer. You are not to tell anything</p> <p>6 else. Everything else you say on this conversation</p> <p>7 is you interrupting me. It is my time, my record,</p> <p>8 my transcript. It's my video, and it's my witness</p> <p>9 today. You are interrupting me every time you open</p> <p>10 your mouth and say anything other than objection or</p> <p>11 instruction.</p> <p>12 MR. BUNIS: Just a moment. I have a</p> <p>13 role to play in this deposition, and I am going</p> <p>14 to -- I'm going to make the record clear. I want to</p> <p>15 make the record clear. I want to make the record</p> <p>16 clear. So if you just give me an opportunity,</p> <p>17 Dimitry, I am not going to interrupt you, and I</p> <p>18 would ask you the same courtesy.</p> <p>19 What I want to say specifically is</p> <p>20 that you are using language like "fair warning" in</p> <p>21 asking questions and directing questions to the</p> <p>22 witness, and I am just going to tell you now that</p> <p>23 you need to be conscious of the language that you</p> <p>24 are using with the witness and to please ratchet</p> <p>25 down. Ratchet down the emotionality and tone of</p>	<p style="text-align: right;">Page 35</p> <p>1 Michael's instructions and objections and speaking</p> <p>2 interruptions are very distracting to me. Very.</p> <p>3 There has been many times when he interrupted,</p> <p>4 started this idiotic, stupid colloquy of his just to</p> <p>5 get me off, and I don't remember or we lost the line</p> <p>6 of thought. And I lost the line of questions, and</p> <p>7 we have to waste time going back and finding it.</p> <p>8 That is another reason I want you to</p> <p>9 stay silent, Michael. Make your objection. Make</p> <p>10 your instruction, and then move on. And if you</p> <p>11 continue to do it -- listen, I am going to move to</p> <p>12 sanction you regardless. You know that. I promise</p> <p>13 you. You know it's being drafted, and you will be</p> <p>14 subject of the motion for sanctions for all your</p> <p>15 conduct prior to today, so don't add to that,</p> <p>16 please.</p> <p>17 MR. BUNIS: Dimitry, as I said before,</p> <p>18 I encourage you to --</p> <p>19 MR. JOFFE: Wait. I am going to take</p> <p>20 five-minute break. I am going to take five-minute</p> <p>21 break. I will come back to my line of questions,</p> <p>22 and then we will continue.</p> <p>23 Are we off the record? You agree,</p> <p>24 Michael, to go off the record so I will calm down</p> <p>25 and not have to spend time with you instead of</p>
<p style="text-align: right;">Page 34</p> <p>1 your language, and then we can move on.</p> <p>2 MR. JOFFE: Mr. Bunis, as you know,</p> <p>3 you -- your idiotic objections and interruptions are</p> <p>4 the only thing that actually piss me off and get me</p> <p>5 off here. You know that, and your only role is to</p> <p>6 try to push me off balance, which you do</p> <p>7 successfully because I just can't stand the tone of</p> <p>8 your voice and your language and your constant,</p> <p>9 constant interruptions. You know that. That what</p> <p>10 irks me.</p> <p>11 But I will go back to my -- as I told</p> <p>12 you, calm, cool, and collected. Just I don't want</p> <p>13 to hear your -- I don't know what is it that you're</p> <p>14 saying all of the time. It's not objections. It's</p> <p>15 not instructions. It's just garbage. Don't</p> <p>16 interrupt me, Michael, and I'll be cool, and we will</p> <p>17 go smoothly and nicely through it.</p> <p>18 Madam Reporter, was there a question</p> <p>19 pending before Michael interrupted me or -- I just</p> <p>20 don't remember when he interrupted. Can you check</p> <p>21 if there was a pending question? If not, I'll try</p> <p>22 to remember what it was.</p> <p>23 THE COURT REPORTER: If you'll give me</p> <p>24 a moment, I'll find --</p> <p>25 MR. JOFFE: And just for the record,</p>	<p style="text-align: right;">Page 36</p> <p>1 talking to the witness? I want to talk to this</p> <p>2 witness. This is very important witness for me.</p> <p>3 The witness will break the case for you today. Can</p> <p>4 I go for five minutes on a break and come back,</p> <p>5 please? Off the record? Can we go off the record</p> <p>6 for five minutes?</p> <p>7 MR. BUNIS: Just a moment. I want</p> <p>8 to -- before we go off the record, we certainly can</p> <p>9 take a break, and I encourage you to calm down.</p> <p>10 MR. JOFFE: I am.</p> <p>11 MR. BUNIS: I would just state -- I</p> <p>12 would just state for the record I have a role to</p> <p>13 play here, and my job is to monitor the questions</p> <p>14 you are asking and make sure that they are</p> <p>15 appropriate and make sure that the witness</p> <p>16 understands, and that is what I am going to do. And</p> <p>17 I am going to do it in as professional manner as I</p> <p>18 can, and I encourage you to do the same.</p> <p>19 MR. JOFFE: Well, you do it as best</p> <p>20 you can, Michael. You do it as best you can. I am</p> <p>21 going to take all of the transcripts to Judge</p> <p>22 Sorokin. We will see how your professional manner</p> <p>23 will stand up then, because I think you are -- your</p> <p>24 behavior -- I don't know. Have you litigated</p> <p>25 outside of Boston anywhere?</p>